

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MAINE**

BRIAN THOMPSON,

Plaintiff,

VS.

JOHNSON CONTROLS, INC.,

Defendant.

CASE NO. 2:22-CV-00060-NT

**JOINT MOTION TO MODIFY THE SCHEDULING ORDER**  
**AND EXTEND ALL DEADLINES**

Defendant Johnson Controls, Inc. (“Defendant”) and Plaintiff Brian Thompson (“Plaintiff”) (collectively, the “Parties”) hereby respectfully move to modify the Joint Discovery Plan and the Court’s scheduling order in this case by 60 days. In support of this motion, the Parties state as follows:

1. Discovery in this case is currently scheduled to close on November 29, 2022.
2. The deadline for filing dispositive motions pursuant to Rule 56 is December 20, 2022.
3. By this Court's order dated July 13, 2022, trial and jury selection are set for March 7, 2023.
4. The Parties request the following extensions of time:

Scheduling Designation	Current Deadline	Proposed Deadline
Completion of Discovery	11/29/2022	01/30/2023
Challenges to Expert Testimony	12/20/2022	02/20/2023
Motions for Summary Judgment	12/20/2022	02/20/2023
Trial	3/7/2023	2 week period beginning 05/09/23

5. Defendant propounded written discovery requests on Plaintiff on September 26, 2022. Plaintiff recently requested an extension of the deadline to respond to Defendant's requests, up through and including November 14, 2022. Defendant granted Plaintiff's extension request based on Plaintiff's agreement to extend the deadline to allow time for Plaintiff's deposition following Defendant's review of Plaintiff's written discovery responses.

6. This is the Parties' first request to extend the deadlines in this matter.

7. The Parties make this request in good faith and in continued cooperation with each other and not for purposes of delay. The Parties further state that the additional time will allow counsel for the Parties to explore options for resolving this matter through private mediation before incurring additional expenses for depositions

**WHEREFORE**, the Parties request that the extensions requested herein be GRANTED.

Respectfully submitted,

/s/ Laura H. White

Laura H. White, Bar No #4025  
WHITE & QUINLAN, LLC  
62 Portland Rd., Suite 21  
Kennebunk, ME 04043  
207-502-7484  
[lwhite@whiteandquinlan.com](mailto:lwhite@whiteandquinlan.com)

Attorney for Plaintiff

Dated: November 8, 2022

/s/ Aimee B. Parsons

Aimee B. Parsons, Bar #6395  
OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.  
Two Monument Square, Suite 703  
Portland, ME 04101  
Telephone: 207-387-2985  
[Aimee.Parsons@Ogletree.com](mailto:Aimee.Parsons@Ogletree.com)

Attorney for Defendant

**CERTIFICATE OF SERVICE**

I, Aimee B. Parsons, hereby certify that the within document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Aimee B. Parsons

Aimee B. Parsons

November 8, 2022